

The Georgia Society of General Surgeons

401 West Fourth St., Albany, Georgia 31701

Because the future depends on the present

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October 25, 2005

Dr. Dan Rahn

c/o DCH

Division of Health Planning, 34th Floor

2 Peachtree St.

Atlanta, GA 30303

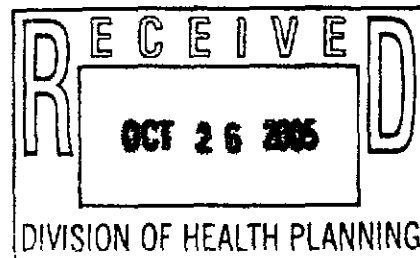
Dear Dr. Rahn,

I want to clarify a point that was made during my testimony at the CON Commission on October 24th. Representative Austin Scott asked me a question about compensation for indigent care at Phoebe Putney. In twenty two years of emergency room coverage, neither I or my partners have ever received compensation for call coverage from Phoebe Putney Memorial Hospital. Although it is accurate that we General Surgeons do not get compensated for taking call, Phoebe did present a program this year that allows physicians to be paid the Medicaid rate for cases that meet certain predefined criteria. The surgeons of Albany Surgical have opted out of this program because it requires us to essentially sell the accounts of those patients to the hospital. Given Phoebe's history of aggressive collection tactics, we are uncomfortable putting patients at further financial risk due to our physician charges. However, I was accurate when I mentioned that Phoebe, as well as other non-profit hospitals, participate in divvying up federal disproportionate share dollars through the state's Indigent Care Trust Fund monies which covers much of their costs of so-called indigent care.

I hope this clarifies our position on this matter and if the commission should have any further discussion on the topic, please notify me so that I can properly respond. Please distribute to all commission members.

Sincerely,

Chris Smith M.D., F.A.C.S.



The State Commission of Efficacy of the Certificate of Need Presented by
Georgia Association for Home Health Agencies, Inc.

Supplemental Information

November 10, 2005

The Georgia Association for Home Health Agencies, Inc. ("GAHHA") appreciated the opportunity to submit written comments to The State Commission of Efficacy of the Certificate of Need ("CON Commission") and make an oral presentation on September 13, 2005. We have additional information which we believe further supports GAHHA's position that the Certificate of Need Program should not be changed.

First, as stated in our previous position paper, there is a significant shortage of nursing, allied health and behavioral health professionals in the State of Georgia. The Health Care Workforce Policy Advisory Committee addressed this problem in a report dated August 2003. We have attached to this submission the cover letter submitted by W. Douglas Skelton, M.D. to the Governor's Office summarizing the report and excerpts from that report. As you will see, the Health Care Workforce Policy Advisory Committee stated that by 2010 Georgia will need over 140,000 new and replacement healthcare workers. Registered nurses made up the vast majority of that projected need (i.e. nearly 30,000 new and replacement registered nurses will be needed by 2010). The report concluded that the projected increases in demand for allied health and behavioral health professionals would significantly outpace the State's present capacity to educate those professionals. The shortage of trained professionals is a significant obstacle in initiating new quality health care services in the State of Georgia.

The Certificate of Need Program regulates the number of home health providers by determining whether there is a need for those providers in any particular service area. As a result, only those providers which are actually needed will be approved. Likewise, the CON Program requires that the applicant be able to show that it can recruit and retain qualified professionals to provide those services. Without the Certificate of Need Program, the number of home health agencies will explode exponentially and there will simply not be sufficient qualified professionals to provide those services. Indeed, the overall quality of those services will more than likely decline.

Second, one of the main criticisms of the CON Program is that it precludes competition. That is not correct. Since 1979 when the CON Program was enacted, there have been over 85 new and/or expanded Certificate of Needs issued to home health agencies in the State of Georgia. In fact, we believe that there have been about twice the number of home health CONs issued during the 1991-2002 time period as compared to the 1979-1990 time period. As a result it cannot be credibly said that competition has been prohibited in Georgia for home health services.

Thank you again for the opportunity to submit this information to you.